



# PUBLIC NOTICE

**Federal Communications Commission**  
**445 12<sup>th</sup> St., S.W.**  
**Washington, D.C. 20554**

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**DA 16-810**  
**Released: July 18, 2016**

**WIRELINE COMPETITION BUREAU AND CONSUMER & GOVERNMENTAL AFFAIRS  
BUREAU SEEK COMMENT ON VTCSECURE LLC PETITION FOR WAIVER OF SECTIONS  
64.613(a)(1)-(2), (4), 64.613(b)(2), AND 64.623(c) OF THE COMMISSION'S RULES AND  
REQUEST FOR DECLARATORY RULING TO PERMIT PROVIDERS OF DIRECT SIGN  
LANGUAGE CUSTOMER SUPPORT SERVICE TO ACCESS THE TELECOMMUNICATIONS  
RELAY SERVICES NUMBERING DIRECTORY**

**WC Docket No. 10-191**  
**CG Docket Nos. 03-123 and 10-51**

**Comment Date: August 17, 2016**  
**Reply Comment Date: September 1, 2016**

On July 6, 2016, VTCSecure LLC (VTCSecure) filed a Petition for Waiver requesting a waiver of sections 64.613(a)(1)-(2), (4), 64.613(b)(2), and 64.623(c) of the Commission's rules and a Declaratory Ruling to permit providers of direct Sign Language customer support services to access the Telecommunications Relay Services (TRS) Numbering Directory.<sup>1</sup> VTCSecure states that these actions "are needed to enable VTCSecure, and any other provider that chooses to do so, to be able to offer direct [Sign Language] customer support service to increase functional equivalence for hearing impaired and speech impaired individuals, reduce costs to the [TRS] Fund, and improve the utility of the Nation's telephone network."<sup>2</sup> VTCSecure also asserts that the Commission should issue a Declaratory Ruling clarifying that Video Relay Service (VRS) providers are required "to support the ability of VRS users to make direct video, voice and text calls to, and receive direct video, voice and text calls from, any [North American Numbering Plan (NANP)] telephone number listed in the TRS Numbering Directory, including direct [Sign Language] customer support service NANP telephone numbers, using the routing information for each such number contained in the TRS Numbering Directory."<sup>3</sup>

Pursuant to section 1.419 of the Commission's rules,<sup>4</sup> interested parties may file comments and reply comments on or before the dates indicated above. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission. Comments and

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<sup>1</sup> Petition of VTCSecure LLC for Waiver of Sections 64.613(a)(1), 64.613(a)(2), 64.613(a)(4), 64.613(b)(2), and 64.623(c) of the Commission's Regulations and Request for Declaratory Ruling to Permit Providers of Direct Sign Language Customer Support Service to Access the TRS Numbering Directory, CG Docket Nos. 10-51 and 03-123 (filed Jul. 6, 2016).

<sup>2</sup> *Id.* at 4.

<sup>3</sup> *Id.* at 18-19.

<sup>4</sup> 47 CFR § 1.419.

reply comments may be filed by paper or by using the Commission's Electronic Comment Filing System (ECFS).<sup>5</sup>

- Electronic Filers: Comments and reply comments may be filed electronically via ECFS: <http://apps.fcc.gov/ecfs>.
- Paper Filers: Parties who choose to file by paper must file an original and one copy of each filing. Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail.
  - All hand-delivered or messenger-delivered paper filings for the Commission's Secretary must be delivered to FCC Headquarters at 445 12th Street, SW, Room TW-A325, Washington, DC 20554. The filing hours are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building.
  - Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743.
  - U.S. Postal Service first-class, Express, and Priority mail must be addressed to 445 12th Street, SW, Washington, DC 20554.

People with Disabilities: To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to [fcc504@fcc.gov](mailto:fcc504@fcc.gov) or call the Consumer & Governmental Affairs Bureau at (202) 418-0530 (voice) or (202) 418-0432 (tty).

The proceeding this Notice initiates shall be treated as a "permit-but-disclose" proceeding in accordance with the Commission's *ex parte* rules.<sup>6</sup> Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made, and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter's written comments, memoranda or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with rule 1.1206(b).<sup>7</sup> In proceedings governed by rule 1.49(f) or for which the Commission has made available a method of electronic filing, written *ex parte* presentations and memoranda summarizing oral *ex parte* presentations, and all attachments thereto, must be filed through the electronic comment filing system available for that proceeding, and must be filed in their native format (e.g., .doc, .xml, .ppt, searchable .pdf). Participants in this proceeding should familiarize themselves with the Commission's *ex parte* rules.

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<sup>5</sup> See Federal Communications Commission, Electronic Filing of Documents in Rulemaking Proceedings, 63 Fed. Reg. 24121 (May 1, 1998).

<sup>6</sup> 47 CFR § 1.1200 *et seq.*

<sup>7</sup> 47 CFR § 1.1206(b).

For further information, please contact Michele Levy Berlove, Competition Policy Division, Wireline Competition Bureau, at (202) 418-1477 or via email at [Michele.Berlove@fcc.gov](mailto:Michele.Berlove@fcc.gov).

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